

Member PA & NJ Bar

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May 26, 2021

Honorable Sharon A. King
United States District Court - District of New Jersey
Mitchell H. Cohen Building and U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: James Long v. City of Philadelphia Et al. - 19-CV-12946

Dear Judge King:

Please be advised that this office represents Plaintiff, James Long, in the above-captioned matter. Tomorrow, the Court has a status conference scheduled at 10:30 a.m. I am writing to notify the Court of some outstanding discovery issues:


1. The State of New Jersey has not yet produced documents requested, namely the prosecution file of Mr. Long, and has objected to producing potentially discoverable documents related to the bench warrant issued by the Honorable Terrence R. Cook on July 18, 2016. Once these documents are received, Plaintiff still needs to depose the State Detective that investigated this matter and Prosecutor that handled the criminal prosecution of Plaintiff.

2. Plaintiff has requested to Defendants, Burlington County and State of New Jersey, the Promise and Gavel System records as it relates to Mr. Long. These have not been provided. These documents are essentially the docket records of Plaintiff's prosecution and would provide discoverable information of the hearings and filings in the criminal prosecution.

Once these documents are received, Plaintiff would like to complete the aforesaid depositions and take two more depositions of City of Philadelphia witnesses.

Thank you for your attention to this matter.

Very truly yours,


WILLIAM J. FOX

cc: Kathryn Morris, DAG
Matthew K. Hubbard, Esquire
Daniel Gee, Esquire
Filed and Serve Via Electronic Filing System